



GTE Service Corporation

1850 M Street, N.W., Suite 1200
Washington, D.C. 20036-5801
202 463-5200
Fax: 202 463-5298

August 10, 1998

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AUG 10 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, DC 20554

RE: Federal-State Joint Board on Universal Service - CC Docket 96-45

**Forward-Looking Mechanism for High Cost Support for Non-Rural
LECs - CC Docket 97-160**

Dear Ms. Salas,

GTE Service Corporation submits the accompanying signed Declarations pursuant to the Commission's Protective Order in CC Docket Nos. 96-45 and 97-160 (DA 98-1490), released July 27, 1998. GTE has provided notice to AT&T and MCI of its intent to inspect the underlying data, formulae, computations, and software associated with the HAI model that has previously been designated as confidential. Authorized representatives of GTE have executed the Declaration as required in Attachment A of the Protective Order.

Please call me at (202) 463-5293 if there are any questions concerning this filing.

Sincerely,

W. Scott Randolph
Director - Regulatory Matters

Attachment

C: ITS

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DATE

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Gail L. Polivy
Assistant
General Counsel



GTE Corporation

1850 M Street, N.W., Suite 1200
Washington, D.C. 20036-5801
202 463-5214
202 463-5281 - fax
e-mail: gpolivy@dcoffice.gte.com

August 10, 1998

Mark C. Rosenblum
Peter H. Jacoby
AT&T Corporation
295 North Maple Avenue
Room 3245H1
Basking Ridge, NJ 07920

David L. Lawson
Scott M. Bohannon
1722 Eye Street, N.W.
Washington, DC 20006

Chris Frentrup
MCI Telecommunications Corporation
1801 Pennsylvania Ave., N.W.
Washington, DC 20006

RECEIVED
AUG 10 1998
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Sirs:

Pursuant to the Protective Order in CC Docket Nos. 96-45 and 97-160 (DA 98-1490) adopted by the Federal Communications Commission on July 27, 1998, GTE hereby provides notice of its intent to inspect the underlying data, formulae, computations, and software associated with the HAI model that has previously been designated as confidential. Authorized representatives of GTE have executed the Declaration in Attachment A of the Protective Order. Copies of the signed Declarations are included.

GTE wishes to arrange a date, time and location when certain authorized representatives may inspect the HAI model. Please contact Scott Randolph at (202) 463-5293 as to where and when AT&T will make this information available for GTE's review. If possible, please provide several possible dates and times.

In the event other individuals are subsequently designated as authorized representatives, we will execute and provide you with copies of their Declarations.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gail Polivy".
Gail L. Polivy
Counsel for GTE

Enclosures

Federal Communications Commission

DA 98-1490

Attachment A:**DECLARATION**

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, Francis J. MURPHY, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) Francis J. Murphy

(printed name) FRANCIS J. MURPHY

(representing) GTE

(title) PRESIDENT

(employer) NETWORK ENGINEERING CONSULTANTS INC. (NECI)

(address) 5 CABOT PL. Suite 3 SToughton MA 01072

(phone) 781-344-7206

(date) AUGUST 10, 1998

Attachment A:

DECLARATION

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, John F. Raposa, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) 

(printed name) John F. Raposa

(representing) GTE

(title) Associate General Counsel

(employer) GTE Service Corporation

(address) 600 Hidden Ridge

(phone) (972) 718-6969

(date) August 7, 1998

Attachment A:

DECLARATION

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, GAIL POLIVY, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed)

Gail Polivy

(printed name)

GAIL POLIVY

(representing)

GTE

(title)

ASST GENERAL COUNSEL

(employer)

GTE SERVICE CORP.

(address)

1850 M STREET NW #1200
WASHINGTON, DC 20036

(phone)

202/463-5214

(date)

8/5/98

Attachment A:

DECLARATION

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, ~~Charles Carrathers~~, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) *Charles Carrathers, III*

(printed name) ~~Charles Carrathers, III~~

(representing) GTE

(title) Assistant General Counsel

(employer) GTE Service Corporation

(address) 600 Hidden Ridge

(phone) (972) 718-7713

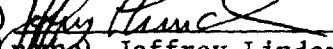
(date) August 7, 1998

Attachment A:

DECLARATION

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, Jeffrey S. Linder, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) 
(printed name) Jeffrey Linder
(representing) GTE
(title) Partner
(employer) Wiley, Rein & Fielding
(address) 1776 K Street, N.W.
(phone) (202) 429-7384
(date) 8-6-98

Attachment A:**DECLARATION**

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, Suzanne Yelen, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) 

(printed name) Suzanne Yelen

(representing) GTE

(title) Associate Attorney

(employer) Wiley, Rein & Fielding

(address) 1776 K Street, N.W. Washington, D.C. 20006

(phone) (202) 429-4287

(date) August 6, 1998

Attachment A:**DECLARATION**

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, Christian Dippon, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) Christian Dippon

(printed name) CHRISTIAN DIPPON

(representing) GTE

(title) SENIOR ANALYST

(employer) National Economic Research Ass. Inc.

(address) 777 S. Figueroa St. Suite 4200, L.A. CA 90017

(phone) 213-346-3025

(date) 08/04/98

Attachment A:**DECLARATION**

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, Jino Kim, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) Jino Kim

(printed name) Jino W. KIM

(representing) NERA (on GTE)

(title) Senior Analyst

(employer) NERA

(address) 777 S. Figueroa St Suite 4200, Los Angeles, CA 90017

(phone) 213 346-3000

(date) 8-4-98

Attachment A:

DECLARATION

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, Karyn Model, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) Karyn Model

(printed name) Karyn Model

(representing) NTE

(title) Sr. Consultant

(employer) NERA

(address) 777 Figueroa St, suite 4200, L.A, CA 90017

(phone) 213-346-3020

(date) 8/5/98

Attachment A:

DECLARATION

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, Barbara Ellis, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) Barbara Ellis

(printed name) Barbara Ellis

(representing) GTE

(title) Staff Mgr - Economic Issues

(employer) GTE

(address) 600 Hidden Ridge, Irving, TX 75015

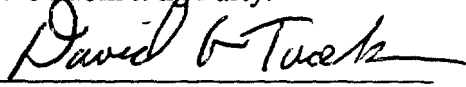
(phone) 972-718-4308

(date) August 6, 1998

Attachment A:**DECLARATION**

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, David G. Tucek, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) 
(printed name) David G. Tucek
(representing) GTE
(title) Staff Manager - Economic Issues
(employer) GTE
(address) 1000 GTE Drive
(phone) 314-332-7678
(date) August 5, 1998

Attachment A:**DECLARATION**

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, Roger White, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) [Signature]

(printed name) Roger White

(representing) GTE

(title) High-Costing Methodology

(employer) GTE

(address) 600 Hidden Ridge, Irving Tx.

(phone) (972) 718-4461

(date) Apr 6, 1998

Attachment A:**DECLARATION**

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, John Gahagan hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) John Gahagan

(printed name) John Gahagan

(representing) GTE

(title) Manager - USF Costing

(employer) GTE

(address) 600 Hidden Ridge Dr, Irving TX 75038

(phone) 972-718-7820

(date) Aug 7, 1998

Attachment A:**DECLARATION**

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, Randolph A. Knox, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) Randolph A. Knox

(printed name) Randolph A. Knox

(representing) GTE

(title) Section Manager - Cost Models & Methods

(employer) GTE

(address) 600 Hidden Ridge Irving, TX

(phone) 972-718-1708

(date) August 7, 1998

Attachment A:**DECLARATION**

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, Subhendu Roy, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) Subhendu Roy

(printed name) SUBHENDU ROY

(representing) GTE

(title) STAFF ADMINISTRATOR

(employer) GTE

(address) 600, HIDDEN RIDGE, IRVING, TX 75038

(phone) 972-7187374

(date) 08/07/98

Attachment A:**DECLARATION**

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, ANN E. JOHNSON, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) Ann E. Johnson

(printed name) ANN E. JOHNSON

(representing) GTE

(title) Manager - Federal Dockets

(employer) GTE

(address) 600 HIDDEN RIDGE, IRVING, TX 75038

(phone) (972) 718-4089

(date) August 7, 1998

Attachment A:**DECLARATION**

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, CANDACE R. LOCKE, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed)

(printed name)

(representing)

(title)

(employer)

(address)

(phone)

(date)

Candace R. Locke

CANDACE R. LOCKE

GTE

MANAGER

GTE

600 HIDDEN RIDGE, IRVING, TX. 75038

972/718-4192

8/7/98

Attachment A:**DECLARATION**

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, MICHAEL MARCOM hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) Michael J. Marcom

(printed name) MICHAEL MARCOM

(representing) GTE

(title) State Rep - Fed

(employer) GTE

(address) 600 Hidden Ridge, Irving, Tx

(phone) (972) 718-7552

(date) 8/7/98

Attachment A:

DECLARATION

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, Eugene E. Castleberry, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) Eugene E. Castleberry

(printed name) Eugene E. Castleberry

(representing) GTE

(title) Staff Manager State Cost Models

(employer) GTE

(address) 600 Hidden Ridge, Irving, TX 75038

(phone) (972) 718-4158

(date) 8/7/98